

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS
ON SEPTEMBER 11, 2001

Civil Action No. 03 MDL 1570 (GBD)
ECF Case

**DECLARATION OF NANCY LUQUE
IN SUPPORT OF MOTION TO WITHDRAW APPEARANCES
OF COUNSEL FOR SANA-BELL, INC. AND SANABEL AL KHEER, INC.**

Nancy Luque, on this 4th day of February 2010, hereby declares that the foregoing is true and correct:

1. I am a member of the law firm Luque Geragos Marino LLP and a member of the D.C. Bar. I make this declaration in support of the motion, pursuant to Local Rule 1.4, to withdraw the appearances of (1) Nancy Luque, Steven A. Maddox, Michael D. McNeely and John Joseph Walsh as counsel for Sanabel Al Kheer, Inc. and, (2) those same attorneys, along with Christopher J. Beal and Jay D. Hanson, as counsel for Sana-Bell, Inc.

2. I briefly represented both Sanabel Al Kheer, Inc. and Sana-Bell, Inc. in this action. By Order dated March 16, 2004, the Court approved my appearance, *pro hac vice*, as counsel for Sanabel Al Kheer, Inc. and Sana-Bell, Inc., along with several other entities and individuals. .

3. By that same March 16, 2004 Order, the Court also approved the appearances, *pro hac vice*, of two other attorneys working with me at the firm Gray Cary Ware & Freidenrich LLP, Steven A Maddox and Michael D. McNeely, on behalf of Sanabel Al Kheer, Inc. and Sana-Bell, Inc.

4. Earlier, on January 27, 2004, another attorney working me with me, John J. Walsh, entered his appearance on behalf of Sanabel Al Kheer, Inc. and Sana-Bell, Inc.

5. By Order dated September 27, 2004, the Court approved the appearances of two other attorneys working with me at Gray Cary Ware & Freidenrich LLP, Jay D. Hanson and Christopher Beal, *pro hac vice* on behalf of Sana-Bell, Inc.

6. Neither myself, nor any of the other attorneys identified above, currently represents either Sanabel Al Kheer, Inc. or Sana-Bell, Inc. Moreover, we have not represented either Sanabel Al Kheer, Inc. or Sana-Bell, Inc. since late 2004 when Martin McMahon took over the representation.

7. Despite this change in representation, neither myself nor the other attorneys identified above moved to withdraw their appearances. However, our failure to do so was inadvertent.

8. It is my understanding that Martin McMahon no longer represents Sanabel Al Kheer, Inc. or Sana-Bell, Inc. and that he recently moved to withdraw his appearance.

9. It is also my understanding that on January 29, 2010, Eurydice Kelley entered appearances on behalf of Sanabel Al Kheer, Inc. or Sana-Bell, Inc.

10. Ms. Kelley, as new counsel for Sanabel Al Kheer, Inc. and Sana-Bell, Inc., has consented to the relief requested herein.

/s/

Nancy Luque